

State Water Resources Control Board

DRAFT REVIEW SUMMARY REPORT – CLOSURE SECOND REVIEW – SEPTEMBER 2014

Agency Information

Agency Name: San Francisco Bay Regional Water Quality Control Board (Regional Water Board)	Address: 1515 Clay Street, Suite 1400 Oakland, CA 94612
Agency Caseworker: Barbara Sieminski	Case No.: 01-2350
Agency Name: Alameda County Water District (ACWD)	Address: 43885 South Grimmer Blvd. Fremont, CA 94538
Agency Caseworker: Doug Young	Case No.: TT0600

Case Information

USTCF Claim No.: 14521	GeoTracker Global ID: T0600102160
Site Name: Hulbert Lumber	Site Address: 37500 Cedar Blvd. Newark, CA 94560
Responsible Party: Hulbert Lumber Attn: Jim Kronenberg	Address: 37500 Cedar Blvd. Newark, CA 94560
USTCF Expenditures to Date: \$683,703	Number of Years Case Open: 16

To view all public documents for this case available on GeoTracker use the following URL.

URL: http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0600102160

Summary

The Low-Threat Underground Storage Tank (UST) Case Closure Policy (Policy) contains general and media-specific criteria, and cases that meet those criteria are appropriate for closure pursuant to the Policy. This case meets all of the required criteria of the Policy. Highlights of the case follow:

This Site is a lumber yard. An unauthorized release was reported in August 1998 following the removal of one 550-gallon gasoline UST and an unknown volume of impacted soil was excavated to a depth of 8 feet below ground surface (bgs). Ozone sparging has been conducted since September 2010, which injected 1,584 pounds of ozone. Since 2001, 11 groundwater monitoring wells have been installed and monitored. According to groundwater data, water quality objectives have been achieved or nearly achieved for all constituents.

The petroleum release is limited to the soil and shallow groundwater. According to data available in GeoTracker, there are no public water supply wells within 250 feet of the defined plume boundary. Alameda County Water District Cedar Well number 2 is located approximately 400 feet northwest (downgradient) of the defined plume boundary. The well is screened from 47 to 107 feet below ground surface. No other water supply wells have been identified within 250 feet of the defined plume boundary in files reviewed. There are no surface water bodies within 250 feet of the defined plume boundary. The unauthorized release is located within the service area of a public water system, as defined in the Policy. Other designated beneficial uses of impacted groundwater are not threatened, and it is highly unlikely that they will be, considering these factors in the context

of the site setting. Remaining petroleum hydrocarbon constituents are limited and stable, and concentrations are decreasing. Corrective actions have been implemented and additional corrective actions are not necessary. Any remaining petroleum hydrocarbon constituents do not pose a significant risk to human health, safety or the environment.

Rationale for Closure under the Policy

- General Criteria: The case meets all eight Policy general criteria.
- Groundwater Specific Criteria: The case meets Policy Criterion 1 by Class 1. The contaminant plume that exceeds water quality objectives is less than 100 feet in length. There is no free product. The nearest water supply well or surface water body is greater than 250 feet from the defined plume boundary.
- Vapor Intrusion to Indoor Air: The case meets Policy Criterion 2a by Scenario 3a. The maximum benzene concentration in groundwater is less than 100 micrograms per liter ($\mu\text{g/L}$). The minimum depth to groundwater is greater than 5 feet, overlain by soil containing less than 100 milligrams per kilogram (mg/kg) of TPH.
- Direct Contact and Outdoor Air Exposure: The case meets Policy Criterion 3a. Maximum concentrations in soil are less than those in Policy Table 1 for Commercial/Industrial use, and the concentration limits for a Utility Worker are not exceeded. There are no soil sample results in the case record for naphthalene. However, the relative concentration of naphthalene in soil can be conservatively estimated using the published relative concentrations of naphthalene and benzene in gasoline. Taken from Potter and Simmons (1998), gasoline mixtures contain approximately 2 percent benzene and 0.25 percent naphthalene. Therefore, benzene can be used as a surrogate for naphthalene concentrations with a safety factor of eight. Benzene concentrations from the Site are below the naphthalene thresholds in Policy Table 1. Therefore, the estimated naphthalene concentrations meet the thresholds in Table 1 and the Policy criteria for direct contact by a factor of eight. It is highly unlikely that naphthalene concentrations in the soil, if any, exceed the threshold.

Objections to Closure and Responses

According to the Path to Closure page in GeoTracker, finalized on November 26, 2013, the ACWD opposes closure because:

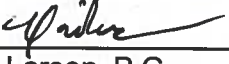
- Conceptual site model is inadequate.
RESPONSE: Adequate data is available in GeoTracker to develop a conceptual site model consistent with the Policy.
- The case does not meet Policy groundwater criteria.
RESPONSE: The case meets Policy Criterion 1 by Class 1.


Determination

The Fund Manager has notified the tank owners or operators and reviewed the case history of their tank case. The Fund Manager determines that closure of the tank case is appropriate based upon that review. The Fund Manager has prepared this review summary report summarizing the reasons for this determination, provided the Review Summary Report to the applicable Regional Water Board and Local Oversight Agency Program, as appropriate, with an opportunity for comment on the Review Summary Report.

Pursuant to Health and Safety Code as of the date of the signature of the Fund Manager below, neither the Regional Water Board or the Local Oversight Program shall issue a corrective action directive or enforce an existing corrective action directive for the tank case until the board issues a decision on the closure of the tank case, unless one of the following applies:

- (A) The Regional Water Board or Local Oversight Program agency demonstrates to the satisfaction of the Fund Manager that there is an imminent threat to human health, safety, or the environment;
- (B) The Regional Water Board or Local Oversight Program agency demonstrates to the satisfaction of the Fund Manager that other site-specific needs warrant additional directives during the period that the State Board is considering case closure;
- (C) After considering responses to the Review Summary Report and other relevant information, the Fund Manager determines that case closure is not appropriate; or
- (D) The Regional Water Board or Local Oversight Program agency closes the tank case but the directives are necessary to carry out case-closure activities.


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Fund Manager

Date

